

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE BOSTON SCIENTIFIC CORPORATION  
SECURITIES LITIGATION

Master File No. 1:05-cv-11934 (DPW)

**PLAINTIFF'S MOTION FOR  
IMPOUNDMENT OF CONFIDENTIAL MATERIAL**

Pursuant to Local Rule 7.2, Lead Plaintiff Public Employees' Retirement System of Mississippi ("Plaintiff") requests that this Court impound the following materials:

- Plaintiff's Memorandum of Law in Support of its Motion to Compel Production of Documents Improperly Claimed as Privileged wherein confidential documents are discussed or quoted.
- Exhibits 1-10 and 23 to the Affidavit of Patricia A. Bloodgood in Support of Plaintiff's Motion to Compel Production of Documents Improperly Claimed as Privilege, dated May 22, 2009.

In support of this Motion, Plaintiff states that the above-identified documents consist of information that the Defendants have designated as "Confidential" under the Stipulation and Order for the Production and Exchange of Confidential Information, entered by the Court on September 30, 2008 [Docket No. 86].

Plaintiff's submission (including Exhibit Nos. 1-10 and 23 and its Memorandum of Law in Support of Motion to Compel) should remain impounded unless and until the Court orders otherwise. In the event this Court has not previously ordered otherwise, Plaintiff's submission should be returned to its undersigned counsel upon resolution of this matter.

A proposed Order granting the Motion for Impoundment of Confidential Materials is attached hereto as Exhibit 1.

Dated: May 22, 2009

Respectfully submitted,

**ZIMMERMAN REED, P.L.L.P.**

s/ Patricia A. Bloodgood

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**CONFERENCE PURSUANT TO LOCAL RULE 7.1(a)(2)**

Plaintiff confirms that the instant motion is required under the agreed upon terms of the Stipulation and Order for the Production and Exchange of Confidential Information [Doc. #86], entered by the Court on September 30, 2008.

**CERTIFICATE OF SERVICE**

I, Patricia A. Bloodgood, hereby certify that on May 22, 2009, I caused PLAINTIFF'S MOTION FOR IMPOUNDMENT OF CONFIDENTIAL MATERIAL to be filed through the ECF system, and that copies of this document will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: May 22, 2009

s/ Patricia A. Bloodgood  
Patricia A. Bloodgood